

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

15cr10200

UNITED STATES OF AMERICA)	
)	
v.)	VIOLATION:
)	18 U.S.C. § 871(a)
)	Threats Against The President
)	
ANDREW J. O'KEEFE,)	
Defendant.)	

COUNT ONE: 18 U.S.C. § 871(a)-Threats Against the President

The Grand Jury charges:

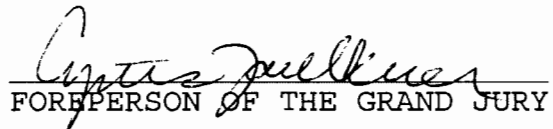
On or about May 13, 2015, in the District of Massachusetts
and elsewhere,


ANDREW J. O'KEEFE,

defendant herein, did knowingly and willfully make a threat to
take the life of and to inflict bodily harm upon the President
of the United States, specifically, he posted the following
message on an FBI webpage: "I'm planning to kill President
Barack Obama, and I've got a really good plan. Have the Secret
Service give me a visit. I could use some company," and that he
did so for the purpose of issuing a threat and with knowledge
that the communication would be viewed as a threat.

All in violation of Title 18, United States Code, Section
871(a).

A TRUE BILL

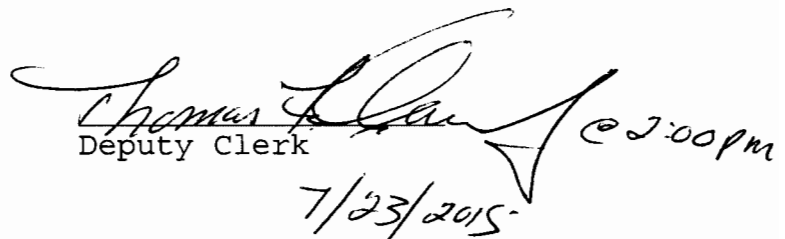

FOREPERSON OF THE GRAND JURY


Kenneth G. Shine
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS

July 23, 2015

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk @ 2:00pm
7/23/2015